



56 Exchange Terrace, Fourth Floor
Providence, Rhode Island 02903
tel: 401 751-5360
fax: 401 751-5499

October 31, 2006

Chief, Environmental Enforcement Section
Environmental and Natural Resources Division
United States Department of Justice
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044

Barbara Healy Smith
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210

Tonia Bandrowicz
Sr. Enforcement Counsel
U.S. EPA
Mail Code: SEL
One Congress Street
Boston, MA 02114-2023

Steven Couto
Environmental Engineer
U.S. EPA
Mail Code: SEW
One Congress Street
Boston, MA 02114-2023

Anne Bingham
Massachusetts Department of Environmental Protection
Southeast Regional Office
20 Riverside Drive
Lakeville, MA 02347

I. Andrew Goldberg
Assistant Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place
18th Floor
Boston, MA 02108



Mr. Goldberg
October 31, 2006
Page 2

Subject: Brockton, Massachusetts
Wastewater Collection/Treatment Facility
Consent Decree Civil Action Case No. 1:06-cv-11334-NMG
2006 - 3rd Quarter Report

Dear Mr. Goldberg:

On behalf of the City of Brockton, we submit a quarterly report for your consideration regarding the City's Consent Decree Civil Action referenced above. This information is an update of the individual ongoing wastewater projects within the City plus other relevant data, in accordance with Section 42 of the Consent Decree.

Section 42 a - Activities Directed at Compliance with the Consent Decree:

1. Miscellaneous Sewer Pipe Repair and Replacement

The City has been performing sewer rehabilitation based on the findings of the City Wide Sewer System Evaluation Survey (SSES). In addition, there are several private contractors performing sewer rehabilitation throughout the City. As a result of this work, many gallons of extraneous flow have been removed from the sewer system. The attached Table 1 is a summary of sewer system repairs documented since 1990. Several structural defects in the sewer system identified in the SSES were repaired by the City and private contractors during the 3rd quarter of 2006, accounting for removal of 14,020 gpd of extraneous flow. This activity is required by Sections 35 through 39 of the Consent Decree.

2. Phase IV Sewer System Rehabilitation

The award of this construction contract is expected to be completed shortly. Construction is expected to commence in October, and is scheduled to be completed in 2007. The construction value is approximately \$2,700,000 and SRF assistance is being provided. This activity is required by Sections 35 through 39 of the Consent Decree.



Mr. Goldberg
October 31, 2006
Page 3

3. Phase V Sewer System Rehabilitation

The Phase V sewer system rehabilitation project is the accumulation of trenchless rehabilitation work not selected as bid alternates on previous projects. Construction of this project is substantially complete, and the estimated value is \$1,600,000 for this SRF funded project. This activity is required by Sections 35 through 39 of the Consent Decree.

4. Phase VI Sewer System Rehabilitation

Design of this project is underway, and is expected to be bid in the spring of 2007. Construction should be completed in 2008. The construction value is approximately \$2,400,000 and SRF assistance is being provided. This activity is required by Sections 35 through 39 of the Consent Decree.

5. Local and State Funding

The City is currently proceeding with the SRF funding package of \$61 million and a second loan offer of \$20 million has been provided by the State. In addition, the City recently modified their authorization for bonding from \$61 million to \$86 million. These funds are required for the upgrade of the wastewater treatment facility and for rehabilitation of the collection system.

6. I/I Reduction by Whitman and Abington

Both Whitman and Abington are required to develop an I/I rehabilitation plan as defined in the new NPDES permit for the Brockton WWTF. Both have been provided a copy of the Consent Decree. This activity is required by Section 40 of the Consent Decree.

7. Wastewater Treatment Facility Upgrade

- a. The Phase I WWTF Upgrade continues as planned. This activity is required by Section 23, 24 and 25 of the Consent Decree.
- b. The Phase II WWTF Upgrade continues as planned. This activity is required by Sections 26 through 29 of the Consent Decree.



Mr. Goldberg
October 31, 2006
Page 4

- c. The Phase III WWTF Upgrade continues as planned. This activity is required by Sections 30 through 34 of the Consent Decree.

Section 42 b - Plans, Reports, and Deliverables Completed and Submitted during this Period:

1. For the Phase III WWTF Upgrade, a notice to proceed was provided to Walsh Construction on September 29, 2006 as required by Section 32 of the Consent Decree.

Section 42 c - Activities Anticipated During the Next Reporting Period:

1. The City will submit the Draft I/I Removal Plan
2. The City will submit the Work Plan for the Lead Analysis SEP
3. The City will submit a quarterly report.
4. Miscellaneous Sewer Pipe Repair and Replacement by City Personnel

Additional sewer rehabilitation by City staff based on the findings of the City Wide Sewer System Evaluation Survey (SSES) is expected to continue during the next reporting period.

5. Phase IV Sewer System Rehabilitation

Construction of this project is expected to commence during the next reporting period.

6. Phase VI Sewer System Rehabilitation

Submittal of draft contract documents for this project is expected during the next reporting period.

7. Wastewater Treatment Facility Upgrade

- a. The City will reach substantial completion of the Phase I WWTF Upgrade by December 23, 2006



Mr. Goldberg
October 31, 2006
Page 5

- b. No submittal requirements for the Phase II WWTF Upgrade during the next reporting period. This project continues on schedule.
- c. No submittal requirements for the Phase III WWTF Upgrade during the next reporting period. This project continues on schedule.

Section 42 d - Anticipated Non-Compliance During the Next Reporting Period:

With the treatment facility currently experiencing hydraulic limitations due to the construction upgrade (which requires the entire South Secondary treatment to be off-line), it is anticipated that the facility will incur periodic effluent excursions. Those excursions are expected to be predominantly for effluent Ammonia Nitrogen limits. With the South Secondary treatment offline for the upgrade, wet weather events could also have an adverse impact on plant performance.

Section 42 e - Non-Compliance during the Current Reporting Period:

During the 3rd quarter of 2006, the City of Brockton WWTF experienced violations mainly for the effluent parameter of NH₃-N with a few effluent TSS excursions. Most of these violations are attributable to the ongoing construction upgrade. The facility was unable to maintain dissolved oxygen limits due to the new North Blower testing and troubleshooting. The facility also experienced limited hydraulic capacities due to the entire South Secondary treatment being fully inoperable during the construction of Phases I and II.

At this point, the testing and troubleshooting of the new North Blowers are partially complete, and will resume following the Phase 3 replacement of the North Diffuser system. The completion of the Phase II work on the South Secondary treatment is scheduled to be completed, tested, and fully on-line during February or March of 2007.



Mr. Goldberg
October 31, 2006
Page 6

We trust this information meets your expectations regarding the required progress report. Please feel free to contact me regarding any questions or comments on this information.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ian W. Mead'. The signature is fluid and cursive, with a large, sweeping 'M' at the end.

Ian W. Mead, P.E.
Camp Dresser & McKee Inc.

cc: J. Condon, Chief Financial Officer
Michael Thoreson, DPW Commissioner
David Norton, Water and Sewer Contract Administrator
Larry Rowley, Utilities Superintendent
David DiLorenzo, Joseph Shepherd, MADEP, SER
Jack Hamm, MADEP, Boston
Gregory A. Roy, CDM

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates	Description of Work	Infiltration Removed	Flow in gallons per day		Exfiltration Source
				Inflow Removed	Total I/I per quarter	
3rd Quarter 2006	September 9, 2006	Keith Avenue, replaced 5' of 8" PVC STA 0+34 (024-039A to 024-039) see Photo 155A				
	May 9, 2006	Upland Road, replaced 3' of 8" PVC STA 0+87 (037-91 to 037-90) see Photos 154A & 154B	1,500 gpd			
	May 11, 2006	Rutland Avenue, replaced 8" pipe and service wye STA 2+33 (037-121A to 037-122) see Photos 153A & 153B	720 gpd			
	May 10, 2006	Rutland Avenue, replaced 4' of 8" PVC STA 1+87 (037-121A to 037-122) see Photos 152A & 152B	720 gpd			
	May 18, 2006	Rutland Avenue, replaced 4' of 8" PVC STA 2+74 (037-121A to 037-122) see Photo 151A	540 gpd			
	May 17, 2006	Rutland Avenue, replaced 4' of 8" PVC STA 2+87 (037-121A to 037-122) see Photos 150A & 150B	540 gpd			
	May 16, 2006	Rutland Avenue, replaced 4' of 8" PVC STA 0+15 (037-121A to 037-122) see Photos 149A & 149B	540 gpd			
	July 19, 2006	Oak Street, replaced service connection STA 2+05 (037-136 to 037-135) see Photos 148A & 148B	2,400 gpd			
	July 20, 2006	Oak Street, replaced 8" pipe service wye STA 2+85 (037-136 to 037-135) see Photos 147A & 147B	1,200 gpd			
	July 25, 2006	Oak Street, replaced 8" pipe and two service tees PVC STA 1+72 (037-135 to 037-134) see Photos 146A & 146B	2,500 gpd			
	August 3, 2006	Oak Street, replaced 8" pipe and service tee STA 0+15 (037-134 to 037-133) see Photos 145A & 145B	1,200 gpd			
	August 7, 2006	Oak Street, replaced pipe and service wyes STA 0+42 (037-134 to 037-133) see Photos 144A & 144B	1,440 gpd			
	August 8, 2006	Oak Street, replaced 8" pipe and service wye STA 2+08 (037-133 to 037-132) see Photos 143A & 143B	720 gpd		14,020 gpd	
2nd Quarter 2006	May 1, 2006	Upland Rd., repl 2' of 8" pipe and 8"X8" sleeve STA 2+45 to 2+47 (037-091 to 037-090) see Photos 142A & 142B	320 gpd			
	April 25, 2006	Orchard Ave., replaced 6' of 8" pipe STA 0+83 to 0+87 (037-130 to 037-129) see Photos 141A & 141B	180 gpd		500 gpd	
1st Quarter 2006	March 21, 2006	Pomona Dr., replaced 17.5' of 6" pipe and 6"X6" sleeve (045-032G to 045-032J) see Photos 140A & 140B				
	March 6, 2006	Main St. behind Shaws, 5' of 8" pipe STA 0+47 to 0+52 (034-12A to 034-012) see Photos 137A to 137B				
	February 28, 2006	Main St. behind Shaws, 5' of 8" pipe STA 0+21 to 0+26 (034-12A to 034-012) see Photos 136A & 136B				
	February 27, 2006	K-Mart Parking, replaced 6' of 8" pipe STA 0+36 to 0+42 (034-012K to 034-012J) see Photo 138A	1,440 gpd			
	February 7, 2006	E. Main St., replaced 5' of 8" pipe STA 2+70 to 2+74 (037-087 to 037-086) see Photos 133A & 133B				
	February 6, 2006	E. Main St., replaced 3' of 8" STA 2+25 to 2+28 (037-087 to 037-086) see Photos 132A & 132B				
	February 2, 2006	P5: Menlo Ave, lined 256.3' of 8" pipe (025-029 to 025-026)	15,750 gpd			
	February 1, 2006	P5: Geralyn Dr. Easement, lined 186' of 10" pipe (067-043 to 067-042)	1,275 gpd			
	February 1, 2006	P5: Easement across Cross Pond, lined 388' of 18" pipe (007-125 to 007-126)				
	January 31, 2006	P5: Boulders Apartments., lined 241' of 8" pipe (045-037E to 045-037D)	2,520 gpd			
	January 31, 2006	P5: Boulders Apartments., lined 150' of 8" pipe (045-037D to 045-037C)	1,440 gpd			
	January 31, 2006	P5: E. Ashland St., lined 153.5' of 15" pipe (045-033 to 045-032)	7,200 gpd			
	January 31, 2006	P5: E. Ashland St., lined 102.5' of 15" pipe (045-032 to 045-031)	2,880 gpd			
	January 30, 2006	P5: Toby Rd., lined 127.5' of 8" pipe (045-034B to 045-033A)	1,440 gpd			
	January 30, 2006	P5: Toby Rd., lined 16.2' of 8" pipe (045-034A to 045-034B)				
	January 30, 2006	P5: Toby Rd., lined 116.3' of 8" pipe (045-034C to 045-034A)				
	January 30, 2006	P5: Toby Rd., lined 192' of 8" pipe (045-036A to 045-035A)	2,160 gpd			
	January 30, 2006	P5: Toby Rd., lined 53' of 8" pipe (045-035A to 045-034C)	180 gpd			
	January 30, 2006	P5: Pleasant St., lined 399.5' of 10" pipe (017-065 to 017-062)	40,320 gpd			
	January 27, 2006	P5: Dover St., lined 451.6' of 10" pipe (018-017 to 018-016A)	6,099 gpd			
	January 27, 2006	P5: Belmont Ave, lined 77.3' of 10" pipe (017-011F to 017-041C)				
	January 26, 2006	P5: No. Warren Ave, lined 271.4' of 10" pipe (019-027 to 019-024)				
	January 26, 2006	P5: No. Warren Ave, lined 247.2' of 10" pipe (019-028 to 019-027)				
	January 26, 2006	P5: No. Warren Ave, lined 200.8' of 10" pipe (019-031 to 019-028)	360 gpd			
	January 26, 2006	P5: Warren Ave, lined 232.3' of 8" pipe (018-016 to 018-017A)	22,800 gpd			
	January 24, 2006	P5: Center St., lined 353.5' of 10" pipe (019-071 to 019-072)				
	January 24, 2006	P5: Center St., lined 145.5' of 10" pipe (019-065 to 019-071)	11,520 gpd			
	January 24, 2006	P5: Center St., lined 143' of 10" pipe (019-037B to 019-065)	720 gpd			
	January 24, 2006	P5: Forest Rd., lined 208' of 8" pipe (018-020A to 018-018B)	2,160 gpd			
	January 24, 2006	P5: Forest Rd., lined 325.6' of 8" pipe (018-018A to 018-018B)	12,960 gpd			
	January 20, 2006	P5: Edward St., lined 212.5' of 8" pipe (047-054 to 047-055)	720 gpd			
	January 20, 2006	P5: Sharon St., lined 150.3' of 8" pipe (047-054 to 047-053)	11,520 gpd			
	January 20, 2006	P5: Sharon St., lined 92.2' of 8" pipe (047-053 to 047-052)				
	January 20, 2006	P5: Sharon St., lined 111.5' of 8" pipe (047-051 to 047-052)	540 gpd			
	January 19, 2006	P5: Skinner St., lined 415.5' of 8" pipe (055-047 to 055-046)				

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		Exfiltration Source
				Inflow Removed	Total I/I per quarter	
1st	January 19, 2006	P5: South Fuller St., lined 276' of 10" pipe (018-016B to 018-016A)	1,275 gpd			
	January 19, 2006	Oakside Ave., replaced 4' of 8" pipe STA 0+73 to 0+77 (033-024 to 033-024) see Photos 134A & 134B				
	January 18, 2006	P5: Lyon Ave, lined 279' of 8" pipe (066-053 to 066-052)	360 gpd			
	January 18, 2006	P5: Sharon St., lined 275.3' of 8" pipe (047-051 to 047-050)	4,320 gpd			
	January 18, 2006	P5: Sharon St., lined 300' of 8" pipe (047-050 to 047-049A)				
	January 18, 2006	P5: Sharon St., lined 200.3' of 8" pipe (047-049A to 047-049)	2,880 gpd			
	January 17, 2006	P5: Main St., lined 321.5' of 8" pipe (066-044 to 066-043)	135 gpd			
	January 17, 2006	P5: Annadea Rd., lined 302.5' of 8" pipe (047-006A to 047-005B)	2,880 gpd			
	January 17, 2006	P5: Annadea Rd., lined 115.5' of 8" pipe (047-005B to 047-004A)				
	January 16, 2006	P5: Skinner St., lined 148.3' of 8" pipe (055-048 to 055-049)	10,975 gpd			
	January 16, 2006	P5: Skinner St., lined 75.5' of 8" pipe (055-048 to 055-046)	410 gpd			
	January 13, 2006	P5: Maplewood Cir., lined 230.9' of 8" pipe (045-021 to 045-022)	1,440 gpd			
	January 13, 2006	P5: Maplewood Cir., lined 247.5' of 8" pipe (045-021 to 045-020)	2,880 gpd			
	January 13, 2006	P5: Joslyn Ln, lined 113.5' of 8" pipe (019-073 to 019-074)	90 gpd			
	January 13, 2006	P5: Joslyn Ln, lined 113.5' of 8" pipe (019-072 to 019-073)	90 gpd			
	January 12, 2006	P5: Cristo's Way, lined 370.9' of 8" pipe (048-051 to 048-050)	11,620 gpd			
	January 12, 2006	P5: Cristo's Way, lined 300.5' of 8" pipe (048-050 to 048-042)	764 gpd			
	January 12, 2006	P5: Woodland Ave, lined 391' of 8" pipe (035-107 to 035-106)	2,760 gpd			
	January 12, 2006	P5: Woodland Ave, lined 263' of 8" pipe (035-109 to 035-107)	69,120 gpd			
	January 12, 2006	Oakside Ave., replaced 5' of 8" pipe STA 1+45 to 1+50 (033-026 to 033-025) see Photos 135A & 135B				
	January 11, 2006	P5: Maplewood Cir., lined 276' of 8" pipe (045-020 to 045-019A)	1,440 gpd			
	January 11, 2006	P5: Maplewood Cir., lined 197' of 8" pipe (045-019 to 045-019A)	1,080 gpd			
	January 11, 2006	P5: Maplewood Cir., lined 201.5' of 8" pipe (045-017 to 045-019)	2,880 gpd			
	January 11, 2006	P5: Camden Ave, lined 198.5' of 8" pipe (020-060C to 020-060B)	12,960 gpd			
	January 11, 2006	P5: Camden Ave, lined 296.5' of 8" pipe (020-060B to 020-060A)	2,160 gpd			
	January 10, 2006	P5: Quincy St., lined 251' of 8" pipe (048-053 to 048-054)	410 gpd			
	January 10, 2006	P5: Beaumont Ave, lined 101' of 8" pipe (048-052 to 048-053)	107 gpd			
	January 10, 2006	P5: Beaumont Ave, lined 149' of 8" pipe (048-051 to 048-052)	107 gpd			
	January 10, 2006	P5: Hampton Ave, lined 417' of 8" pipe (035-108 to 035-107)	177 gpd			
	January 9, 2006	P5: Plain St., lined 286.7' of 8" pipe (066-090 to 066-089A)	5,000 gpd			
	January 4, 2006	Jane Ter., replaced 3' of 6" pipe STA 1+57 to 1+60 (033-022 to 033-021) see Photos 139A & 139B	1,440 gpd		285,764 gpd	
	Oct - Nov 2005	P5: Rehabilitation of 117 manholes	94,608 gpd			
	December 22, 2005	P5: Main Street, lined 277' of 8" pipe (066-042 to 066-041)				
	December 22, 2005	P5: Main Street, lined 248.5' of 8" pipe (066-043 to 066-042)	11,520 gpd			
	December 21, 2005	P5: Quincy Street, lined 273.7' of 8" pipe (048-056 to 048-055)	3,610 gpd			
	December 21, 2005	P5: Quincy Street, lined 279.2' of 8" pipe (048-055 to 048-053)	4,350 gpd			
	December 20, 2005	P5: Manomet Street, lined 277.45' of 8" pipe (020-053 to 020-054)	2,520 gpd			
	December 19, 2005	P5: Theresa Road, lined 232.1' of 8" pipe (067-065 to 067-066)	117 gpd			
	December 15, 2005	P5: Ash Street, lined 206.2' of 8" pipe (017-026 to 017-024)	1,620 gpd			
	December 15, 2005	P5: Ellsworth Street, lined 235.8' of 8" pipe (017-024 to 017-022)	4,320 gpd			
	December 14, 2005	P5: Spring Street, lined 210.6' of 8" pipe (017-043 to 017-053)	13,680 gpd			
	December 14, 2005	P5: Highland Terrace, lined 228.6' of 8" pipe (017-050 to 017-043)	7,560 gpd			
	December 13, 2005	P5: No. Quincy Street, lined 34' of 8" pipe (049-105 to 049-105A)	102 gpd			
	December 13, 2005	P5: No. Quincy Street, lined 314' of 8" pipe (049-106 to 049-105)	4,500 gpd			
	December 13, 2005	P5: No. Quincy Street, lined 285' of 8" pipe (049-108 to 049-106)	7,200 gpd			
	December 12, 2005	P5: Moraine Street, lined 335.05' of 8" pipe (017-066 to 017-065)	2,160 gpd			
	December 7, 2005	P5: Main Street, lined 327' of 8" pipe (066-045 to 066-044)	2,700 gpd			
	December 7, 2005	P5: Main Street, lined 304.7' of 8" pipe (066-049 to 066-045)				
	December 7, 2005	P5: Main Street, lined 203.4' of 8" pipe (066-052 to 066-049)	3,600 gpd			
	December 5, 2005	P5: Brunswick Street, lined 268.4' of 8" pipe (117-097 to 117-100)	1,440 gpd			
	December 1, 2005	P5: Summer Street, lined 139.65' of 8" pipe (066-083 to 066-079)	5,760 gpd			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day			Exfiltration Source
				Inflow Removed	Total I/I per quarter		
4th Quarter 2005	December 1, 2005	P5: Summer Street, lined 54.3' of 8" pipe (066-083 to 066-084)					
	December 1, 2005	P5: Summer Street, lined 174.45' of 8" pipe (066-084 to 066-085)					
	December 1, 2005	P5: Summer Street, lined 215.2' of 8" pipe (066-085 to 066-086)	1,080 gpd				
	November 30, 2005	P5: Pleasant Street, lined 152' of 8" pipe (017-162 to 017-160B)	1,080 gpd				
	November 30, 2005	P5: Pleasant Street, lined 308.3' of 8" pipe (017-160B to 017-160A)	8,460 gpd				
	November 30, 2005	P5: Pleasant Street, lined 307.7' of 8" pipe (017-160A to 017-160)					
	November 29, 2005	P5: Prospect Avenue, lined 308.05' of 8" pipe (017-114 to 017-113)	4,320 gpd				
	November 28, 2005	P5: Cross Country (off E. Ashland), lined 195.3' of 15" pipe (045-034 to 045-035)	1,382 gpd				
	November 28, 2005	P5: Cross Country (off E. Ashland), lined 207.4' of 15" pipe (045-033 to 045-034)	1,473 gpd				
	November 18, 2005	P5: No. Quincy Street, lined 70.15' of 8" pipe (049-102 to 049-102A)	107 gpd				
	November 18, 2005	P5: No. Quincy Street, lined 275.45' of 8" pipe (049-103 to 049-102)	4,380 gpd				
	November 18, 2005	P5: No. Quincy Street, lined 287.2' of 8" pipe (049-104 to 049-103)	7,250 gpd				
	November 18, 2005	P5: No. Quincy Street, lined 326.1' of 8" pipe (049-105A to 049-104)	7,250 gpd				
	November 18, 2005	P5: E. Ashland Street, lined 21' of 12" pipe (040-015 to 040-016)	8,640 gpd				
	November 18, 2005	P5: E. Ashland Street, lined 152' of 12" pipe (040-003B to 040-015)	6,480 gpd				
	November 17, 2005	P5: Easement (between Manomet & Grafton), lined 129.3' of 8" pipe (020-048 to 020-043)	1,800 gpd				
	November 17, 2005	P5: Easement (between Manomet & Grafton), lined 250.7' of 8" pipe (020-049 to 020-048)	1,800 gpd				
	November 16, 2005	P5: No. Quincy Street, lined 295.8' of 8" pipe (045-072 to 045-074)					
	November 16, 2005	P5: No. Quincy Street, lined 301.6' of 8" pipe (045-075 to 045-074)					
	November 16, 2005	P5: No. Quincy Street, lined 239.6' of 8" pipe (045-075 to 045-076)					
	November 15, 2005	P5: Georgene Drive, lined 208.7' of 8" pipe (067-067A to 067-067)	764 gpd				
	November 15, 2005	P5: Georgene Drive, lined 210.35' of 8" pipe (067-069 to 067-067A)	8,095 gpd				
	November 14, 2005	P5: Clinton Street, lined 286.9' of 8" pipe (018-010A to 018-010)	5,760 gpd				
	November 10, 2005	P5: Cross Country, lined 161.45' of 12" pipe (045-017 to 045-016)	6,808 gpd				
	November 10, 2005	P5: Cross Country, lined 155.9' of 12" pipe (045-016 to 045-015)	6,643 gpd				
	November 10, 2005	P5: Cross Country, lined 245.1' of 12" pipe (045-015 to 045-014)	10,356 gpd				
	November 10, 2005	P5: Cross Country, lined 236.85' of 12" pipe (045-014 to 045-013)	10,068 gpd				
	November 10, 2005	P5: Cross Country, lined 224.9' of 12" pipe (045-013 to 045-012A)	9,325 gpd				
	November 10, 2005	P3: High Street, replaced 173.9' of 8" pipe (019-091 to 019-088A)	360 gpd				
	November 9, 2005	Hatchfield Dr, replaced 2' of 8" pipe STA 1+01 to 1+03 (032-055C to 032-055B) see Photo 131A & 131B	1,440 gpd				
	November 9, 2005	P5: Twelfth Avenue, lined 298.7' of 8" pipe (067-033 to 067-031)	6,873 gpd				
	November 9, 2005	P5: Twelfth Avenue, lined 297' of 8" pipe (067-034 to 067-033)	6,873 gpd				
	November 9, 2005	P5: Twelfth Avenue, lined 191.3' of 8" pipe (067-035 to 067-034)	3,254 gpd				
	November 8, 2005	P5: Carleton Street, lined 407.1' of 8" pipe (017-127 to 017-088)					
	November 7, 2005	P5: Plain Street, lined 349.1' of 8" pipe (067-065 to 067-067)	764 gpd				
	November 4, 2005	P5: August Avenue, lined 270.8' of 8" pipe (017-110 to 017-074)	2,160 gpd				
	November 2, 2005	P5: Hamilton Street, lined 273.7' of 8" pipe (117-097 to 117-099)	2,940 gpd				
	November 2, 2005	P5: Hamilton Street, lined 275.8' of 8" pipe (117-098 to 117-099)	1,440 gpd				
	November 2, 2005	P5: Boulders Apartments, lined 304.9' of 8" pipe (045-037E to 045-037G)	4,583 gpd				
	November 2, 2005	P5: No. Quincy Street, lined 292.4' of 8" pipe (049-109 to 049-108)	5,050 gpd				
	November 2, 2005	P5: No. Quincy Street, lined 337.1' of 8" pipe (049-109 to 049-110)					
	November 2, 2005	P5: Bedford Street, lined 347.65' of 8" pipe (045-047 to 045-048)					
	November 2, 2005	P5: Bedford Street, lined 158.8' of 8" pipe (045-047 to 045-046)					
	November 2, 2005	P5: Manomet Street, lined 149.85' of 8" pipe (020-061 to 020-060)	3,960 gpd				
	November 2, 2005	P5: Manomet Street, lined 136.1' of 8" pipe (020-066 to 020-065)	180 gpd				
	November 2, 2005	P5: Manomet Street, lined 267.1' of 8" pipe (020-065 to 020-061)	315 gpd				
	November 2, 2005	P5: Anania Terrace, lined 388.4' of 8" pipe (020-067 to 020-065)	14,400 gpd				
	November 2, 2005	P5: Loucraft Avenue, lined 310.4' of 8" pipe (019-043 to 019-042)					
	November 2, 2005	P5: Maplewood Cir., lined 242.8' of 10" pipe (045-031A to 045-033B)	21,600 gpd				
	November 2, 2005	P5: Maplewood Cir., lined 152.1' of 10" pipe (045-031A to 045-030A)	4,320 gpd				
	November 2, 2005	P5: Maplewood Cir., lined 90' of 10" pipe (045-029A to 045-030A)	1,440 gpd				

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		
				Inflow Removed	Total I/I per quarter	Exfiltration Source
3rd Quarter 2005	November 2, 2005	P5: Maplewood Cir., lined 308.3' of 10" pipe (045-029A to 045-028)	5,040 gpd			
	October 19, 2005	P5: Pomona Drive, lined 279.5' of pipe (045-032A to 045-032B)				
	October 19, 2005	P5: Pomona Drive, lined 105.4' of pipe (045-032A to 045-032G)	2,800 gpd			
	October 19, 2005	P5: Pomona Drive, lined 213.5' of pipe (045-032H to 045-032G)	360 gpd			
	October 19, 2005	P5: Pomona Drive, lined 118.6' of pipe (045-032H to 045-032I)	720 gpd			
	October 19, 2005	P5: Pomona Drive, lined 47.3' of pipe (045-032C to 045-032B)				
	October 19, 2005	P5: Oberline Road, lined 319.6' of pipe (045-032B to 045-032D)				
	October 19, 2005	P5: Annadea Road, lined 297.9' of 8" pipe (047-007A to 047-006A)	3,600 gpd			
	October 19, 2005	P5: Annadea Road, lined 227.9' of 8" pipe (047-007A to 047-008A)	1,080 gpd			
	October 19, 2005	P5: Annadea Road, lined 221.3' of 8" pipe (047-009A to 047-008A)	1,448 gpd			
	October 19, 2005	P5: Court Street, lined 422.65' of 8" pipe (047-061 to 047-063)	4,320 gpd			
	October 19, 2005	P5: Court Street, lined 245.3' of 8" pipe (047-061 to 047-020)	1,080 gpd			
	October 17, 2005	P5: Charline Drive, lined 57.15' of 8" pipe (047-062 to 047-062A)				
	October 17, 2005	P5: Charline Drive, lined 336.6' of 8" pipe (047-061 to 047-062)	2,700 gpd			
	October 13, 2005	P5: Pomona Drive, lined 243.3' of pipe (045-032 to 045-032A)	3,600 gpd			
	October 12, 2005	P5: Bark Circle, lined 238' of 8" pipe (045-083 to 045-084)				
	October 12, 2005	P5: Bark Circle, lined 205.4' of 8" pipe (045-083 to 045-082)				
	October 11, 2005	P3: Lincoln Street, replaced 205.2' of 10" pipe (019-103A to 019-103B)	2,160 gpd			
	October 11, 2005	P3: Lincoln Street, replaced 126.3' of 10" pipe (019-103B to 019-103C)				
	October 11, 2005	P3: Lincoln Street, replaced 59.9' of 10" pipe (019-103C to 019-103D)				
	October 11, 2005	P3: Lincoln Street, replaced 94.1' of 10" pipe (019-103D to 019-103E)				
	October 11, 2005	P3: Lincoln Street, replaced 134.1' of 10" pipe (019-103E to 019-103F)				
	October 11, 2005	P3: School St, replaced 294' of 10" pipe (019-088 to 019-103B)	720 gpd		396,268 gpd	
	Sept. 27 - 28, 2005	P5: Rehabilitation of 7 manholes	5,760 gpd			
	September 23, 2005	Van Cliff, replaced 8" pipe STA 3+00 to 3+05 (032-053 to 032-052) see Photos 127A & 127B				
	September 21, 2005	Marie Ave., replaced 8" pipe STA 2+70 to 2+89 (050-065 to 050-065B) see Photos 129A & 129B	2,880 gpd			
	September 21, 2005	Marie Ave., replaced 6' of 8" pipe STA 2+20 to 2+26 (050-066 to 050-067) see Photo 130A & 130B	1,440 gpd			
	September 20, 2005	Budd Ave., replaced 8" pipe STA 1+50 to 1+55 (053-062 to 053-063) see Photos 128A & 128B	7,200 gpd			
	September 16, 2005	P3: Green St., replaced 275' of 6" pipe (019-025 to 019-024)	1,440 gpd			
	September 12, 2005	Van Cliff, replaced 8" pipe STA 1+65 to 1+69 (032-053 to 032-052) see Photos 126A & 126B				
	September 6, 2005	P3: N. Warren Ave., replaced 365' of 8" pipe (019-042 to 019-040)				
	September 6, 2005	P3: N. Warren Ave., replaced 157' of 8" pipe (019-044 to 019-042)	6,840 gpd			
	August 31, 2005	P2: Bartlett St., replaced 19.5' of 30" pipe (018-051B to 018-051)				
	August 31, 2005	P2: Chester Ave., replaced 18' of 18" pipe (018-051A to 018-051)				
	August 31, 2005	P2: Chester Ave., replaced 19.5' of 18" pipe (018-051B to 018-056)				
	August 31, 2005	P2: Chester Ave., replaced 89.5' of 18" pipe (018-056 to 018-056B)				
	August 25, 2005	West St., replaced 4' of 10" sewer pipe STA 1+29 to 1+33 (014-077 to 014-078)	1,440 gpd			
	August 23, 2005	P3: Roan Crt., replaced 286' of 8" pipe (019-041 to 019-040)				
	August 19, 2005	Roan Court, removed water & sewer service cross connection @ abandoned lot (019-040 to 019-041)	21,600 gpd			
	August 11, 2005	Rockland St., replaced service wye at STA 1+70 (031-088 to 031-093) see Photos 122A & 122B				
	August 10, 2005	Rockland St., replaced wye & pipe STA 0+84 - 0+89 (031-087 to 031-086) see Photos 123A & 123B				
	August 10, 2005	Windsor Cir., replaced 8" pipe STA 1+55 to 1+60 (031-090 to 031-089) see Photos 124A & 124B	5,760 gpd			
	August 8, 2005	Rockland St., replaced 8" pipe STA 0+00 to 1+05 (031-088 to 031-093) see Photos 121A & 121B				
	August 8, 2005	Chester Ave., replaced sewer manhole with underdrain connection (018-056) see Photos 119A	14,400 gpd			
	August 5, 2005	Adams St., replaced 8' of 8" pipe (053-097 to 053-096) see Photo 120A and 120B	7,200 gpd			
	August 5, 2005	P3: Plain St., replaced 265' of 12" pipe (066-080 to 066-079)				
	August 5, 2005	P3: Plain St., replaced 229' of 12" pipe (066-080 to 066-081)				
	August 5, 2005	P3: Plain St., replaced 254' of 12" pipe (066-081 to 066-082)				
	July 19, 2005	Calvin St., replaced service wye at STA 0+30 (031-031 to 031-030) see Photos 125A & 125B	2,880 gpd		78,840 gpd	

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		
				Inflow Removed	Total I/I per quarter	Exfiltration Source
2nd Quarter 2005	June 17, 2005	P3: Otis St., replaced 223' of 8" pipe (055-043 to 055-042B)	410 gpd			
	May 30, 2005	Forest Ave., replaced pipe (021-032 to 021-031) see Photos 116A & 116B				
	May 17, 2005	Carrol Ave., replaced service wye STA 1+06 (025-021B to 025-021A) see Photos 115A & 115B	720 gpd			
	May 16, 2005	P3: Appleby St., replaced 283' of 10" pipe (067-015 to 067-028)	760 gpd			
	May 12, 2005	P3: Armistion St., replaced 334' of 10" pipe (045-060 to 045-059)	8,640 gpd			
	May 12, 2005	P3: Armistion St., replaced 336' of 10" pipe (045-061 to 045-060)	4,320 gpd			
	May 11, 2005	P3: Twelfth Ave., replaced 300' of 8" pipe (067-031 to 067-028)	570 gpd			
	May 11, 2005	Carrol Ave., replaced service wye STA 0+59 (025-021B to 025-021A) see Photos 118A & 118B	1,440 gpd			
	May 10, 2005	Carrol Ave., replaced pipe STA 1+42 to 1+47 (025-021A to 025-021C) see Photos 117A & 117B				
	May 6, 2005	P3: Twelfth Ave., replaced 225' of 10" pipe (067-028 to 067-027)	8,990 gpd			
	April 28, 2005	P3: Armistion St., replaced 300' of 8" pipe (045-062 to 045-061)				
	April 28, 2005	P3: Armistion St., replaced 238' of 8" pipe (045-063 to 045-062)	720 gpd			
	April 15, 2005	P3: Pratt St., replaced 207' of 10" pipe (045-064 to 045-065)	36,000 gpd			
	April 12, 2005	P3: Armistion St., replaced 340' of 10" pipe (045-058 to 045-059)	8,640 gpd			
1st Quarter 2005	April 12, 2005	P3: Allerton St., replaced 269' of 10" pipe (045-064 to 045-061)	30,240 gpd		101,450 gpd	
	March 26, 2005	Woodard Ave, replaced 4' of 12" pipe from STA 2+21 to 2+25 (025-103 to 025-102)	1,440 gpd			
	March 18, 2005	Woodard Ave, replaced service wye STA 0+87 (025-03 to 025-02) see Photos 114A & 114B	1,440 gpd			
	February 16, 2005	Vesey St., replaced pipe from STA 0+89 to 0+97 (023-028 to 023-027) see Photos 113A & 113B				
	February 14, 2005	Vesey St., replaced service wye at STA 2+11 (023-029 to 023-028) see Photos 112A & 112B				
	January 14, 2005	P3: Otis St., replaced 223' of 8" pipe (055-043 to 055-042B)	410 gpd			
	January 11, 2005	Hillberg Ave., replaced pipe from STA 0+35 to 0+51 (023-042 to 023-041) see Photos 111A & 111B	1,440 gpd			
	January 11, 2005	Hillberg Ave., replaced pipe from STA 0+78 to 0+94 (023-040A to 023-040) see Photos 107A & 107B	438 gpd		5,168 gpd	
	December 21, 2004	Hillberg Ave., replaced pipe from STA 0+97 to 1+01 (023-044 to 023-043) see Photos 108A & 108B	1,440 gpd			
	December 14, 2004	P2: Silver Rd., replaced 685' of 10" pipe (017-059 to 017-061)	15,840 gpd			
	December 14, 2004	Tremont St., replaced wye & pipe from STA 2+30 to 2+36 (023-016 to 023-014) see Photos 109A & 109B	1,440 gpd			
	Dec. 13-30, 2004	Whitman Interceptor lining, Southfield Dr., East St. to Edison Easement (1,570 ft)	20,000 gpd			
	December 13, 2004	French Ave., replaced pipe from STA 1+13 to 1+25 (023-027 to 023-025) see Photos 110A & 110B	2,160 gpd			
	December 3, 2004	P3: Annadea Rd., replaced 253' of 8" pipe (047-003A to 047-002A)	2,160 gpd			
4th Quarter 2004	December 3, 2004	P3: Edward St., replaced 295' of 8" pipe (047-042 to 047-043)	8,640 gpd			
	December 3, 2004	P3: Edward St., replaced 207' of 8" pipe (047-042 to 047-041)	2,160 gpd			
	December 3, 2004	P3: Crane Rd., replaced 301' of 8" pipe (047-15A to 047-14A)	2,160 gpd			
	December 3, 2004	P3: Crane Rd., replaced 297' of 8" pipe (047-016A to 047-015A)	4,140 gpd			
	December 3, 2004	P3: Crane Rd., replaced 197' of 8" pipe (047-017A to 047-016A)	360 gpd			
	December 3, 2004	P2: Edward St., replaced 537' of 8" pipe (047-041 to 047-043)	10,800 gpd			
	December 3, 2004	P2: Crane rd., replaced 804' of 8" pipe (047-014A to 047-017A)	6,660 gpd			
	December 2, 2004	P3: Twin Oaks, replaced 225' of 8" pipe (047-009A to 047-010B)	4,320 gpd			
	December 2, 2004	P3: Twin Oaks, replaced 300' of 8" pipe (047-011A to 047-009A)	17,285 gpd			
	December 2, 2004	P3: Twin Oaks, replaced 250' of 8" pipe (047-011A to 047-012A)	5,760 gpd			
	December 2, 2004	P2: Twin Oaks Dr., replaced 769' of 8" pipe (047-009A to 012A and 010B)	27,365 gpd			
	December 2, 2004	French Ave., replaced pipe from STA 0+45 to 0+47 (023-027 to 023-025) see Photos 105A & 105B	1,440 gpd			
	November 29, 2004	P2: Belmont Ave., replaced 89' of 8" and 10" pipe (017-011F to 017-011F1)				
	November 22, 2004	P2: Augusta Ave., replaced 763' of 8" and 6" pipe (017-110 to 017-115)	3,060 gpd			
	November 16, 2004	P2: Greenfield St., replaced 456' of 8" and 6" pipe (017-110 to 017-111)	360 gpd			
	November 8, 2004	P2: Spring St., replaced 292' of 8" pipe (017-036 to 017-037)	7,020 gpd			
	November 2, 2004	French Ave., replaced pipe from STA 0+16 to 0+18 (023-027 to 023-025) see Photos 106A & 106B	4,102 gpd			
	November 2, 2004	P2: Poplar Rd., replaced 654' of 8" pipe (017-053 to 017-CAP6)	13,680 gpd			
	October 26, 2004	P2: Brook St. replaced 1,097' of 8" and 10" pipe (018-012A to 018-030)	5,220 gpd			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		Exfiltration Source
				Inflow Removed	Total I/I per quarter	
3rd Quarter 2004	October 25, 2004	P2: Green St., replaced 508' of 8" and 10" pipe (017-034 to 017-035)	11,430 gpd			
	October 14, 2004	Myrtle St, replaced pipe STA 0+14 to 0+18 (022-036 to 022-035) see Photos 94A	4,320 gpd			
	October 12, 2004	P2: Newbury St., replaced 528' of 8" and 6" pipe (017-128 to 017-131)	7,200 gpd			
	October 4, 2004	School St, replaced pipe from STA 0+05 to 0+9 (019-103B to 019-103A) see Photos 95A & 95B	2,160 gpd		192,682 gpd	
	September 30, 2004	Lincoln St, capped service STA 2+03 (019-103A to 019-103) see Photos 97A & 97B				
	September 30, 2004	Lincoln St, replaced pipe from STA 0+80 to 0+85 (019-103A to 019-103) see Photos 96A & 96B	1,440 gpd			
	September 30, 2004	P2: Ash St., replaced 299' of 8" pipe (017-038 to 017-039)	360 gpd			
	September 24, 2004	Center St, replaced pipe STA 0+82 to 0+94 (019-65 to 019-37B) see Photos 99A & 99B	650 gpd			
	September 24, 2004	Center St, replaced service wye STA 1+08 (019-73 to 019-74) see Photos 98A	1,440 gpd			
	September 22, 2004		4,320 gpd			
		P2: Boylston St. replaced 561' of 8" pipe (020-054 to 020-056)				
	September 20, 2004	High St, replaced pipe from STA 1+15 to 1+21 (019-091 to 019-088A) see Photos 100A & 100B	1,440 gpd			
	September 15, 2004					
		P2: Camden Ave., replaced 292' of 8" pipe (020-060 to 020-060A)				
	September 14, 2004	Legion PKW, replaced pipe from STA 0+46 to 0+64 (019-076 to 019-090) see Photos 101A & 101B	4,320 gpd			
	September 8, 2004		1,440 gpd			
		Legion PKW, replaced pipe from STA 0+96 to 0+98 (019-079 to 019-076) see Photos 102A & 102B				
	September 8, 2004	P2: Forest Rd. replaced 218' of 8" pipe (018-20A to 018-021A)	720 gpd			
	September 7, 2004					
	September 7, 2004	Center St, replaced service wye STA 0+19 (019-73 to 019-72) see Photos 103A & 103B				
	September 2, 2004	Packard WY, replaced pipe STA 3+01 to 3+10 (021-004 to 021-003) see Photos 104A	2,880 gpd		19,010 gpd	
2nd Quarter 2004					0 gpd	
1st Quarter 2004					0 gpd	
4th Quarter 2003	Sept 26 - Dec 31, 2003	Abington removal of 8 sump pumps		172,800	172,800 gpd	
3rd Quarter 2003	July 2003	P1: 002-079 MH rehab	2,880 gpd			
	July 2003	P1: 002-081 MH rehab	2,880 gpd			
	July 2003	P1: 002-098 MH rehab	4,320 gpd			
	July 2003	P1: 002-201 MH rehab	2,880 gpd			
	July 2003	P1: 002-200A MH rehab	2,880 gpd			
	August 2003	P1: 004-006 MH rehab	5,760 gpd			
	July 2003	P1: 009-017A MH rehab	7,200 gpd			
	July 2003	P1: 011-001 MH rehab	5,760 gpd			
	July 2003	P1: 011-002 MH rehab	4,320 gpd			
	July 2003	P1: 011-018 MH rehab	2,880 gpd			
	August 2003	P1: 012-067 MH rehab	2,160 gpd			
	July 2003	P1: 012-076 MH rehab	2,880 gpd			
	July 2003	P1: 017-125 MH rehab	4,320 gpd			
	August 2003	P1: 017-054 MH rehab	7,200 gpd			
	July 2003	P1: 021-001 MH rehab	28,800 gpd			
	August 2003	P1: 025-041A MH rehab	4,320 gpd			
	July 2003	P1: 027-068 MH rehab	2,160 gpd			
	July 2003	P1: 031-016 MH rehab	2,880 gpd			
	July 2003	P1: 031-089 MH rehab	7,200 gpd			
	July 2003	P1: 031-050A MH rehab	7,200 gpd			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		Exfiltration Source
				Inflow Removed	Total I/I per quarter	
3rd Quarter	July 2003	P1: 032-019 MH rehab	4,320 gpd			
	August 2003	P1: 033-021 MH rehab	2,880 gpd			
	August 2003	P1: 041-079 MH rehab	7,200 gpd			
	July 2003	P1: 045-033 MH rehab	7,200 gpd			
	August 2003	P1: 045-065 MH rehab	7,200 gpd			
	July 2003	P1: 046-113A MH rehab	2,160 gpd			
	July 2003	P1: 047-029 MH rehab	4,320 gpd			
	July 2003	P1: 048-057D MH rehab	3,600 gpd			
	July 2003	P1: 049-091 MH rehab	2,160 gpd			
	August 2003	P1: 052-010 MH rehab	3,600 gpd			
	July 2003	P1: 061-011 MH rehab	5,040 gpd			
	July 2003	P1: 065-021 MH rehab	7,200 gpd			
	July 2003	P1: 065-028 MH rehab	31,680 gpd			
	August 2003	P1: 065-008A MH rehab	2,160 gpd			
	August 2003	P1: 117-088A MH rehab	4,320 gpd			
	August 2003	P1: Pleasant Street 008-011 to 008-010 61' 8"	5,900 gpd			
	August 2003	P1: Rockland Street 008-013 to 008-012 306' 8"	25,000 gpd			
	July 2003	P1: Belair Street 004-040 to 004-023 116' 10"	3,600 gpd			
	July 2003	P1: Belair Street 004-023 to 004-020, 248' 10"	15,120 gpd			
	July 2003	P1: Belair Street 004-020 to 004-016, 298' 10"	16,560 gpd			
	July - Sept. 2003	Abington removal of 21 sump pumps		440,000 gpd	712,100 gpd	
2nd Quarter 2003	May 2003	P1: Belair Street 004-045 to 004-044 361' 8"	0 gpd			
	May 2003	P1: Belair Street 004-044 to 004-042 115' 8"	0 gpd			
	April 2003	P1: Belair Street 004-042 to 004-041 243' 8"	1,275 gpd			
	April 2003	P1: Belair Street 004-041 to 004-040 364' 8"	2,880 gpd			
	June 2003	P1: North Cary Steet 040-031 to 040-029 164' 12"	11,520 gpd			
	June 2003	P1: North Cary Steet 040-029 to 040-028 338' 12"	112,320 gpd			
	April 8, 2003	P1: Belair Street 004-016 to 017-012A, 357' 10"	14,400 gpd		142,395 gpd	
1st Quarter 2003	March 20, 2003	P1: Belair Street 017-012A to 017-011A 55' 10"	0 gpd			
	March 10, 2003	P1: Westgate Drive 007-127F to 007-127Q 196' 12"	34,560 gpd			
	February 26, 2003	P1: Easement off E. Westgate Dr. 007-127D to 007-127C 326' 12"	30,560 gpd			
	February 15, 2003	P1: Easement off E. Westgate Dr. 007-127C to 007-127B 251' 12"	57,500 gpd			
	February 10, 2003	P1: Easement off E. Westgate Dr. 007-127B to 007-127 335' 12"	410 gpd		123,030 gpd	
4th Quarter 2002	December-02	P1: Belair Street 017-011A to 017-010B 174' 10"	26,640 gpd			
	December-02	P1: Belair Street 017-010B to 017-011B 98' 10"	11,520 gpd			
	November-02	P1: Belair Street 017-011B to 017-010A 111' 10"	0 gpd			
	November-02	P1: Belair Street 017-010A to 017-009A, 280' 10"	2,160 gpd			
	November-02	P1: Belair Street 017-009A to 017-001B 209' 10"	0 gpd			
	Oct - Dec 2002	Removal of 138 private sump pumps throughout the city		3,008,000 gpd		
	October 3, 2002	Legion PKW, disconnected private catch basin, STA 0+48 (019-077 to 019-076) see Photo 93A & 93B		107,000 gpd	3,155,320 gpd	
3rd Quarter 2002	August 20, 2002	Removed catch basin grate on sewer manhole at end of Thatcher Crt. (MH 058-022)	100,000 gpd			
	July 30, 2002	Ash St., replaced pipe and service from STA 1+22 to 1+56 (017-039 to 017-038) see Photo 92B	4,320 gpd			
	July 29, 2002	S. Fuller St., replaced pipe from STA 0+27 to 0+33 (018-016B to 018-016A) see Photo 90A & 90B	SPL			
	July 27, 2002	Dover St., replaced service wye at STA 2+24 (018-017 to 018-016A) see Photo 87A & 87B	360 gpd			
	July 25, 2002	Dover St., replaced service wye at STA 2+40 (018-017 to 018-016A) see Photo 88A	1,440 gpd			
	July 24, 2002	Forest Rd., replaced pipe from STA 0+17 to 0+23 (018-021A to 018-020A) see Photo 91A & 91B	SPL			
	July 23, 2002	Dover St., removed service wye at STA 2+18 (018-018B to 018-019C) see Photo 89A & 89B	SPL		106,120 gpd	

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		
				Inflow Removed	Total I/I per quarter	Exfiltration Source
2nd Quarter 2002	May 28, 2002	Spring St., replaced pipe from STA 1+73 to 1+75 (017-038 to 017-037) see Photo 78A & 78B	SPL			
	May 21, 2002	Spring St., replaced service wye at STA 1+82 (017-037 to 017-036) see Photo 76A & 76B	4,320 gpd			
	May 20, 2002	Poplar Rd., replaced service wye at STA 0+60 (017-054 to 017-053) see Photo 77A & 77B	2,880 gpd			
	May 17, 2002	Poplar Rd., replaced service wye at STA 0+84 (017-055 to 017-054) see Photo 75A & 75B	720 gpd			
	May 13, 2002	Poplar Rd., replaced service wye at STA 1+22 (017-055 to 017-054) see Photo 85A & 85B	1,440 gpd			
	May 9, 2002	Augusta Ave., replaced pipe from STA 1+08 to 1+12 (017-115 to 017-113) see Photo 84A & 84B	SPL			
	May 8, 2002	Prospect Ave., replaced pipe from STA 0+23 to 0+27 (017-114 to 017-113) see Photo 83A & 83B	4,320 gpd			
	May 8, 2002	Hancock Av., replaced pipe from STA 0+47 to 0+49 (009-086 to 009-085A) see Photo 74A & 74B	720 gpd			
	May 7, 2002	Earle St., replaced pipe from STA 2+20 to 2+25 (017-013A to 017-011A) see Photo 82A & 82B	SPL			
	May 7, 2002	Earle St., replaced pipe from STA 0+50 to 0+52 (017-013A to 017-011A) see Photo 79A & 79B	SPL			
	May 6, 2002	Elm St., replace pipe from STA 0+02 to 0+06 (011-011A to 011-011) see Photo 86A & 86B	720 gpd			
	May 2, 2002	Sunset Dr., replaced pipe from STA 0+00 to 0+05 (011-016 to 011-015) see Photo 81A & 81B	2,880 gpd			
1st Quarter 2002	May 1, 2002	Sunset Dr., replaced pipe from STA 2+72 to 2+77 (011-017 to 011-016) see Photo 80A & 80B	720 gpd		18,720 gpd	
	March 28, 2002	Hancock Ave., removed service stub at STA 1+45 (009-087 to 009-086) see Photo 73A & 73B	200 gpd			
	March 21, 2002	Hancock Ave., replaced service wye at STA 1+06 (009-087 to 009-086) see Photo 72A & 72B	1,440 gpd			
	March 11, 2002	Sunset Dr., replaced pipe from STA 1+45 to 1+52 (009-028 to 009-027) see Photo 71A & 71B	2,880 gpd			
	March 6, 2002	Margery Rd., replaced pipe from STA 1+11 to 1+16 (009-024 to 009-025A) see Photo 65A & 65B	1,440 gpd			
	March 5, 2002	Candy Ln., replaced pipe from STA 1+64 to 1+68 (009-021 to 009-020) see Photo 62A & 62B	100 gpd			
	March 4, 2002	Candy Ln., replaced pipe from STA 0+26 to 0+51 (009-020 to 009-019) see Photo 67A & 67B	1,440 gpd			
	February 28, 2002	Candy Ln., removed stub at STA 1+96 (009-021 to 009-020) see Photo 61A & 61B	SPL			
	February 26, 2002	Candy Ln., replaced pipe from STA 1+58 to STA 1+64 (009-020 to 009-019) see Photo 63A & 63B	1,000 gpd			
	February 25, 2002	N. Pearl St., replaced pipe from STA 0+15 to STA 0+25 (009-78A to 009-79) see Photo 70A & 70B	600 gpd			
	February 21, 2002	Candy Ln., replaced pipe from STA 0+0 to STA 0+28 (009-021B to 009-021) see Photo 68A & 68B	200 gpd			
	February 20, 2002	Candy Ln., replaced pipe from STA 2+63 to STA 2+68 (009-021 to 009-020) see Photo 69A & 69B	360 gpd			
4th Quarter 2001	February 20, 2002	Candy Ln., replaced pipe from STA 1+09 to STA 1+15 (009-021A to 009-021B) see Photo 64A & 64B	100 gpd			
	January 10, 2002	E. Westgate Dr., replaced pipe from STA 0+48 to STA 0+52 (007-127I to 007-127G) see Photo 66A & 66B	1,440 gpd		11,000 gpd	
	November 24, 2001	203 Prospect St., replaced broken service pipe at STA 0+10 (006-094 to 006-096)	SPL			
	November 19, 2001	Candy Lane, replaced pipe from STA 0+10 to 0+14 (009-041 to 009-040)	1,440 gpd			
	November 15, 2001	Candy Ln., replaced pipe from STA 2+31 to 2+37 (009-043 to 009-043A) see Photo 59A & 59B	SPL			
	November 14, 2001	Margery Rd., replaced pipe from STA 2+40 to 2+47 (009-042 to 009-041) see Photo 60A & 60B	SPL			
	November 13, 2001	Santee Road, replace pipe from STA 2+12 to 2+14 (009-058 to 009-056) see Photo 58A & 58B	SPL			
	November 13, 2001	Santee Road, replace pipe from STA 0+77 to 0+80 (009-058 to 009-056) see Photo 57A & 57B	SPL			
	November 13, 2001	Santee Road, replace pipe from STA 0+50 to 0+53 (009-058 to 009-056) see Photo 56A & 56B	SPL			
	October 17, 2001	191 Grove St., replaced broken pipe from approx. STA 0+40 to 0+46 (056+011 to 056+010)	SPL			
	October 9, 2001	West Street, replaced service wye at STA 0+30 (014-080 to 014-079) see Photo 55A	SPL		1,440 gpd	
3rd Quarter 2001	September 9, 2001	Fitzpatrick Cir, replaced pipe from STA 0+16 to 0+18 (005-104A to 005-104) see Photo 54B	SPL			
	August 20, 2001	Fitzpatrick Cir, replaced service wye at STA 1+32 (005-100 to 005-102) see Photo 52A & 52B	720			
	August 16, 2001	Fitzpatrick Cir, replaced service wye at STA 0+15 (005-098 to 005-099A) see Photo 48A & 48B	720			
	August 14, 2001	Fitzpatrick Cir, replaced service wye at STA 0+43 (005-104 to 005-102A) see Photo 53A & 53B	1,440			
	August 13, 2001	Fitzpatrick Cir, replaced wye & main from STA 1+12 to 1+20 (005-104A to 005-104) see Photo 49A & 49B	8,640			
	August 7, 2001	Sophia Ave., replaced pipe from STA 2+68 to 2+70 (005-104 to 005-136) see Photo 50A & 50B	SPL			
	August 3, 2001	Fitzpatrick Cir, replaced pipe from STA 2+38 to 2+46 (005-100 to 005-102) see Photo 51A & 51B	SPL		11,520 gpd	
	June 12, 2001	Oak Ridge Dr., replaced pipe from STA 1+40 to 1+55 (004-084 to 004-080) see Photo 47A & 47B	4,680 gpd			
	May 22, 2001	Crickett Rd., replaced pipe from STA 0+49 to 0+53 (004-057A to 004-053) see Photo 44A & 44B	7,200 gpd			
	May 21, 2001	Crickett Rd., replaced pipe from STA 1+82 to 1+86 (004-057A to 004-053) see Photo 45A & 45B	SPL			
	May 15, 2001	Shaws Parking Lot, removed entire 24" pipe (028-038 to 028-039)	SPL			
	May 15, 2001	Shaws Parking Lot, replaced entire 8" pipe (028-039 to 038-039A)	SPL			
3Q1	May 10, 2001	VFW off N. Quincy, repaired service pipe and wye see Photo 46A & 46B	100,000 gpd			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		
				Inflow Removed	Total I/I per quarter	Exfiltration Source
2nd Quarter 2001	May 5, 2001	57 Wilder St., house service connected directly to drain pipe was removed see Photo 43	-			X
	April 25, 2001	Berglund Ave., replaced pipe from STA 2+10 to 2+13 (004-021 to 004-020) see Photo 37A & 37B	SPL			
	April 24, 2001	Berglund Ave., replaced pipe from STA 1+84 to 1+92 (004-021 to 004-020) see Photo 34A & 34B	SPL			
	April 23, 2001	Berglund Ave., replaced service wye at STA 2+35 (004-021 to 004-020) see Photo 36A & 36B	dripping			
	April 20, 2001	Benham St., replaced pipe from STA to () see Photo 38A & 38B	???			
	April 19, 2001	Miller Ave., Replaced pipe from STA to () see Photo 39A & 39B	???			
	April 12, 2001	Berglund Ave., replaced pipe from STA 1+71 to 1+74 (004-021 to 004-020) see Photo 35A & 35B	SPL			
	April 10, 2001	Thompson Ave., replaced pipe from STA 1+03 to 1+07 (004-017 to 004-016) see Photo 41A & 41B	SPL			
	April 9, 2001	Thompson Ave., replaced 6 " pipe from STA 0+38 to 0+44 (004-017 to 004-016) see Photo 42A & 42B	SPL			
1st Quarter 2001	April 2, 2001	Reservoir Road, replaced service at wye at STA 0+74 (002-104 to 002-103) see Photo 40A & 40B	1,440 gpd		108,640 gpd	
	March 27, 2001	Belmont and Ash St., replaced 8" pipe from STA 0+10 to 0+15 (018-072 to 018-073) see Photo 31A & 31B	SPL			
	March 19, 2001	Coventry Cir., replaced pipe from STA 0+91 to 0+97 (004-039A to 004-039) see Photo 34A & 34B	SPL			
	March 16, 2001	Coventry Cir., replaced pipe from STA 1+49 to 1+54 (004-039B to 004-039A) see Photo 32A & 32B	SPL			
	March 1, 2001	Coventry Cir., replaced pipe from STA 0+37 to 0+42 (004-039A to 004-039) see Photo 33A & 33B	14,400 gpd			
	February 27, 2001	Coventry Cir., replaced pipe from STA 0+70 to 0+76 (004-039B to 004-039A) see Photo 30A & 30B	SPL			
	February 26, 2001	Coventry Cir., replaced service connection at STA 0+12 (004-039B to 004-039A) see Photo 26A & 26B	5,760 gpd			
	February 20, 2001	Colonel Bell Dr., replaced pipe from STA 2+41 to 2+44 (004-007 to 004-006) see Photo 29A & 29B	2,880 gpd			
	February 12, 2001	Coventry Cir., replaced service connection at STA 1+44 (004-039A to 004-039) see Photo 27A & 27B	4,320 gpd			
	February 9, 2001	Coventry Cir., replaced pipe from STA 1+79 to 1+82 (004-039A to 004-039) see Photo 28A & 28B	4,320 gpd			
	January 30, 2001	Colonel Bell Dr., replaced service connection at STA 1+16 (004-036 to 004-024) see Photo 22A & 22B	4,320 gpd			
	January 29, 2001	Colonel Bell Dr., removed service wye at STA 1+04 (004-025 to 004-026) see Photo 21A & 21B	SPL			
	January 31, 2001	Colonel Bell Dr., removed service wye at STA 0+33 (004-008 to 004-007) see Photo 23A & 23B	SPL			
	January 23, 2001	Colonel Bell Dr., replaced pipe from STA 1+34 to 1+37 (004-025 to 004-026) see Photo 25A & 25B	SPL			
	January 9, 2001	Colonel Bell Dr., replaced pipe from STA 0+62 to 0+64 (004-004 to 004-003) see Photo 24A & 24B	2,160 gpd		38,160 gpd	
4th Quarter 2000	Nov. 30, 2000	West Haven Dr., replaced service connection at STA 0+44 (001-029 to 001-028) see Photo 12A & 12B	720 gpd			
	Nov. 28, 2000	West Haven Dr., replaced 7' of 8 "pipe, STA 1+85 to 1+92 (001-029 to 001-028) see Photo 20A & 20B	47 gpd *			
	Nov. 16, 2000	Elliot St., replaced 8' of broken pipe at house #184 (042-121 to 042-122) see Photo 15A & 15B	2,880 gpd			
	Nov. 14, 2000	Darren Dr., replaced pipe at leaking joint at STA 0+52 (001-028 to 001-026) see Photo 19A & 19B	SPL			
	October 26, 2000	Darren Dr., replaced pipe at leaking joint at STA 0+89 (001-028 to 001-026) see Photo 17A & 17B	SPL			
	October 23, 2000	Darren Dr., replaced 3 ' of cracked pipe STA 1+65 (001-028 to 001-026) see Photo 18A & 18B	SPL			
	October 17, 2000	Darren Dr., replaced 2' of broken pipe at STA 0+08 (001-028 to 001-026) see Photo 16A & 16B	SPL			
	October 5, 2000	Perkins Ave., replaced wye at STA 2+96 (063-009B to 063-005) see Photo 13A & 13B	SPL			
	October 3, 2000	Perkins Ave., plugged service wye at STA 3+30 (063-009B to 063-005) see Photo 14A & 14B	SPL			
3rd Quarter 2000	Sept. 15, 2000	Fitzpatrick Circle replaced 7' of 8" VCP	SPL		3,647 gpd	
	August 21, 2000	Vine St., replaced broken pipe and service STA 0+99 to 1+01 (037-093 TO 037-092) see Photo 8A & 8B	SPL			
	August 17, 2000	12 Orchard Ave., removed service connection at STA 0+79 (037-128 to 037-127) see Photo 9A & 9B	180 gpd			
	August 18, 2000	14 Orchard Ave., replaced service connection at STA 2+28 (037-128 to 037-127) see Photo 10A & 10B	SPL			
	July 29, 2000	Van Cliff Ave., replaced service at STA 0+31 (032-059 to 032-052)	SPL			
	July 27, 2000	Paulin Ave., replaced service at STA 0+93 (065-070 to 065-069) see Photo 11A & 11B	720 gpd			
	July 26, 2000	Burrl St., replaced service & broken pipe from STA 2+18 to STA 2+19 (048-051 to 048-050)	2,160 gpd			
	July 19, 2000	Roan Crt., replaced service connections at STA 0+27 & 0+29 (019-041 to 019-040) see Photo 1a & 1b	SPL			
	July 19, 2000	Roan Crt., replaced service connection at STA 0+61 (019-041 to 019-040) see Photo 2a & 2b	SPL			
	July 18, 2000	Albany St., replaced leaking joints at STA 2+85 (001-019 to 001-018) see Photo 3a & 3b	2,880 gpd			
	July 13, 2000	Stubb Rd., replaced service connection at STA 0+39 (009-026 to 009-024) see Photo 5a & 5b	360 gpd			
	July 13, 2000	Stubb Rd., replaced service connection at STA 1+03 (009-026 to 009-024) see Photo 6a & 6b	360 gpd			
	July 12, 2000	Stubb Rd., replaced broken pipe from STA 0+18 to 0+20 (009-026 to 009-024) see Photo 7a & 7b	2,880 gpd			
	July 11, 2000	Windsor Cir., Replaced a service tap at STA 0+05 (031-092 to 031-091) see Photo 4A & 4B	28,800 gpd		38,340 gpd	
1st	May 2000	Winnifred Road, service replacement at STA 1+32 (015-025 to 015-024)	360 gpd			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		
				Inflow Removed	Total I/I per quarter	Exfiltration Source
2nd Quarter 2000	May 2000 April 13, 2000 ?	Fitzpatrick Avenue, replaced 300' of 8-in VC pipe that was defective (005-145A to MH 005-143) Main Interceptor infiltration leak at Meadow Lane bridge crossing Embassy Nursing Home had direct sewer connection to surface water	2,010 gpd * 45,000 gpd		47,370 gpd	X
1st Quarter 2000					0 gpd	
4th Quarter 1999	December 1999 ?	Howard Street Sewer Replacement, 4,460 ft Snell Place Sewer Replacement of 15 ft	29,882 gpd * 101 gpd *		29,983 gpd	
3rd Quarter 1999	July 1999 July 1999	Country Club Lane Sewer Replacement of 400 ft Country Club Place Sewer Replacement of 400 ft	2,680 gpd * 2,680 gpd *		5,360 gpd	
2nd Quarter 1999	April 5, 1999	Bellaire St. MH 004-016 to 004-015 replaced 10' of 10" pipe between STA 1+83 & 1+89	67 gpd *		67 gpd	
1st Quarter 1999	March 29, 1999 March 22, 1999	Bellaire St. MH 004-016 to 004-015 replaced 6' of 10" pipe & 1 service between STA 1+37 & 1+41 Bellaire St. MH 017-010B to 017-010A replace 6' of 10" pipe starting @ STA 0+28	40 gpd * 40 gpd *		80 gpd	
4th Quarter 1998	September 1998 September 1998 September 1998 September 1998	Warren & Keith, 60 ft west (Holmgren project) Warren & W. Chestnut, 74 ft west (Holmgren project) Warren & Calmar, 74 ft east (Holmgren project) Warren & Market to Copeland, 1,135 ft (Holmgren project)	402 gpd * 496 gpd * 496 gpd * 7,605 gpd *		8,999 gpd	
1st, 2nd, 3rd Quarter 1998	1998 January 1998	Ellsworth (cured in place lining) 522 linear feet (017-125 to 017-118) Disconnected CB connection to sewer at Stonehill College (at Duffy Academic Center)	3,497 gpd * 41,200 gpd *		44,697 gpd	
4th Quarter 1997	December 1997	Warren & Clifton, north to Nilsson, 3,000 ft	20,100 gpd *		20,100 gpd	
3rd Quarter 1997	August 1, 1997 ? ? August 1, 1997	137 Perkins Ave, broken sewer leaking into a broken drain below Sewer overflow disconnected at siphon on Bartlett St. Sewer overflow disconnected on the East Side Interceptor Matfield Woods Estates, possible infiltration from a force main crossing of a brook			0 gpd	X X X X
1st & 2nd Quarter 1997	April 1997 March 1997 January 27, 1997	Sawtell Ave. Sewer Replacement of 300 ft with 8" PVC (between Glendale St. and Alden St.) Wilmington St. Sewer Replacement of 100 ft with 15" PVC 150 Lisa Drive Replaced 8 ft of sewer with 8" PVC Market Street Sewer Replacement	2,010 gpd * 670 gpd * 54 gpd *		2,734 gpd	
4th Quarter 1996	October 1996 October 1996	Oak Green Apartments off Reservoir Street, disconnected a sewer MH from draining a surface water Biscayne Street Disconnected this abandoned private street from the city sewer because of several defects and constant I/I.	900,000 gpd		1,470,000 gpd	
1st Quarter 1996	August 1996 August 1996	Howard Street Bridge Reconstruction, replaced 150 ft under bridge with 12" DI Terminal Place on Evans St., replaced 300 ft of sewer with 8" PVC	570,000 gpd 1,005 gpd * 2,010 gpd *			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Infiltration Removed	Flow in gallons per day		Exfiltration Source
				Inflow Removed	Total I/I per quarter	
3rd Quarter 1995					3,015 gpd	
2nd Quarter 1996	May 1996	- Replaced 50 ft from Warren Ave. going west with 8" PVC	335 gpd *			
	May 1996	- Replaced 250 ft from intersection of Copeland with 12" DI	1,675 gpd *			
	May 1996	- Replaced 240 ft from Warren Ave. going east with 24" PVC	1,608 gpd *		3,618 gpd	
1st Quarter 1996	March 22, 1996	Augusta Ave. replaced 6 ft with 8" PVC	40 gpd *			
	February 29, 1996	Ash St. and Pleasant St. replaced 25 ft with 8" PVC	168 gpd *			
					208 gpd	
4th Quarter 1995	Dec. 27, 1995	68 Belair St. replaced 18 ft with 10" PVC	121 gpd *			
					121 gpd	
	Jan.-May 1995	Howard Street Interceptor Project				
		- Replaced 838 ft on Intervale St. with 21" PVC	5,615 gpd *			
		- Replaced 244 ft on Dyer St. with 21" PVC	1,635 gpd *			
		- Replaced 1,511 ft on Winter St., Douglas St., and Oscar Ave. with 18" PVC	10,124 gpd *			
	May 6, 1995	Rainville St. replaced 6 ft with 15" PVC	40 gpd *			
	April 1995	Sump pump removed at 55 Albert St.	8,640 gpd **			
	April 1995	Sump pump removed at 115/117 Ames St.	8,640 gpd **			
	April 1995	Sump pump removed at 234 Ames St.	8,640 gpd **			
	April 1995	Sump pump removed at 266 Ames St.	8,640 gpd **			
	April 1995	Sump pump removed at 60 Arthur St.	8,640 gpd **			
	April 1995	Sump pump removed at 122 Arthur St.	8,640 gpd **			
	April 1995	Sump pump removed at 21 Baltic Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 70 Baltic Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 185 Baltic Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 155 Alden St.	8,640 gpd **			
	April 1995	Sump pump removed at 116 Ames St.	8,640 gpd **			
	April 1995	Sump pump removed at 260 Ames St.	8,640 gpd **			
	April 1995	Sump pump removed at 292 Ames St.	8,640 gpd **			
	April 1995	Sump pump removed at 105 Arthur St.	8,640 gpd **			
	April 1995	Sump pump removed at 136 Arthur St.	8,640 gpd **			
	April 1995	Sump pump removed at 40 Baltic Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 77 Baltic Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 38 Banks St.	8,640 gpd **			
	April 1995	Sump pump removed at 65 Lawton Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 35 Louis St.	8,640 gpd **			
	April 1995	Sump pump removed at 22 Merton St.	8,640 gpd **			
	April 1995	Sump pump removed at 58 Merton St.	8,640 gpd **			
	April 1995	Sump pump removed at 96 Merton St.	8,640 gpd **			
	April 1995	Sump pump removed at 116 North Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 154 North Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 37 Saint Casimir St.	8,640 gpd **			
	April 1995	Sump pump removed at 30 Louis St.	8,640 gpd **			
	April 1995	Sump pump removed at 29 Merton St.	8,640 gpd **			
	April 1995	Sump pump removed at 68 Merton St.	8,640 gpd **			
	April 1995	Sump pump removed at 112 North Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 122 North Ave.	8,640 gpd **			

Table 1
City of Brockton, Massachusetts
Consent Decree, Civil Action Case No. 1:06-cv-11334-NMG
Response to Section 42a - Activities Directed at Compliance with the Consent Decree
History of Sewer System Repair and Rehabilitation

Annual Quarter	Dates Work Performed	Description of Work	Flow in gallons per day			
			Infiltration Removed	Inflow Removed	Total I/I per quarter	Exfiltration Source
	April 1995	Sump pump removed at 165 Ridge St.	8,640 gpd **			
	April 1995	Sump pump removed at 24 Vermont Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 64 Banks St.	8,640 gpd **			
	April 1995	Sump pump removed at 11 Bellevue Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 124 Bellevue Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 43 Claremont St.	8,640 gpd **			
	April 1995	Sump pump removed at 107 Hovendon Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 115 Hovendon Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 164 Hovendon Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 247 Howard St.	8,640 gpd **			
	April 1995	Sump pump removed at 10 Intervale St.	8,640 gpd **			
	April 1995	Sump pump removed at 19 Westford St.	8,640 gpd **			
	April 1995	Sump pump removed at 91 Banks St.	8,640 gpd **			
	April 1995	Sump pump removed at 117 Bellevue Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 59 Bonney St.	8,640 gpd **			
	April 1995	Sump pump removed at 25 Granite St.	8,640 gpd **			
	April 1995	Sump pump removed at 114 Hovendon Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 121 Hovendon Ave.	8,640 gpd **			
	April 1995	Sump pump removed at 243 Howard St.	8,640 gpd **			
	April 1995	Sump pump removed at 267 Howard St.	8,640 gpd **			
	April 1995	Sump pump removed at 15 Intervale St.	8,640 gpd **			
	April 11, 1995	240 Colonel Bell Drive replaced 6 ft with 8" PVC	40 gpd *			
	January 1, 1995	Sheridan St. replaced 10 ft with 10" PVC	67 gpd *			
	September 7, 1994	Braemoor Rd. replaced 8 ft with 8" PVC	54 gpd *			
	August 24, 1994	39 Southworth St. replaced 10 ft with 8" PVC	67 gpd *			
	August 1994	Fisk St. Sewer Replacement of 50 ft with 8" PVC	335 gpd *			
	June 6, 1994	Market St. replaced 200 ft with 10" PVC	1,340 gpd *			
	June 1994	I/I Rehabilitation Conducted by Atlantic Development Corporation				
		- Disconnected driveway drain from sewer at 28 Amark St.	4,320 gpd ***			
		- Disconnected driveway drain from sewer at 306 Field St.	4,320 gpd ***			
	Dec. 15, 1993	16 Hill St. replaced 8 ft with 8 PVC	54 gpd *			
	April 13, 1990	249 Boylston St. replaced 8 ft with 8" PVC	0 gpd *			
	May 1, 1990	Pleasant St. at Belair St. replaced 18 ft with 10" PVC	121 gpd *			

* I/I estimate based on average I/I rate of 6.7 gpd/ft.

** I/I estimate based on pump rate of 6 gpm.

*** I/I estimate based on pump rate of 3 gpm.

SPL: signs of previous leakage

Estimated Total I/I Removed: 7,855,578 gpd

Photographs of Rehabilitation Conducted by Brockton Sewer Department

Before

Photo 143A - Oak Street



After

Photo 143B - Oak Street



Photo 144A - Oak Street



Photo 144B - Oak Street



**Photographs of Rehabilitation Conducted by
Brockton Sewer Department**

Before

Photo 145A - Oak Street



After

Photo 145B - Oak Street

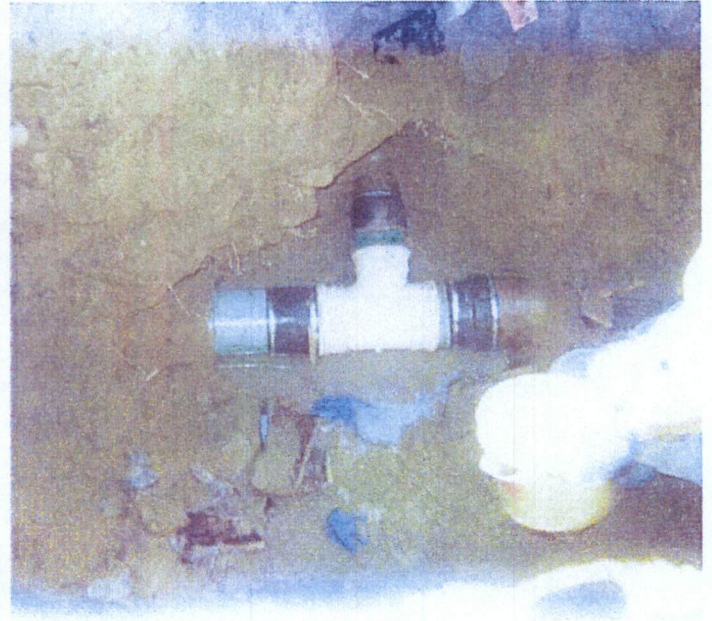
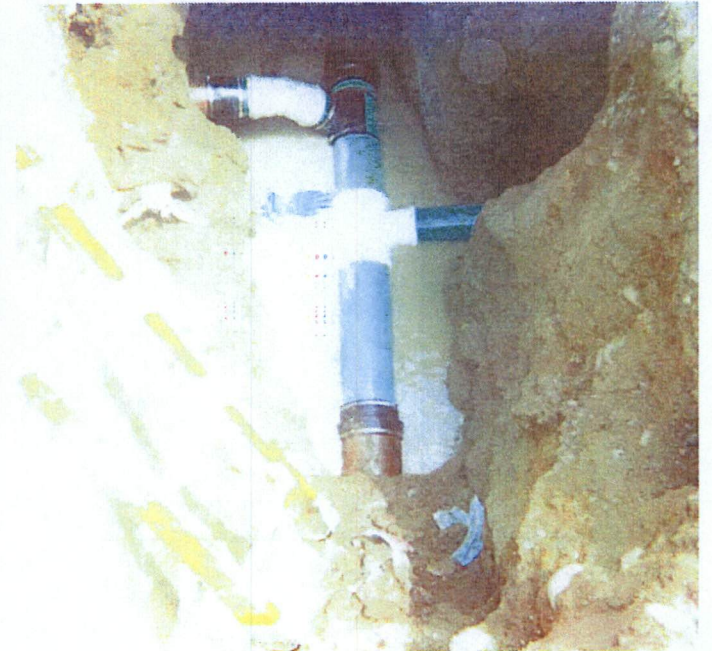


Photo 146A - Oak Street



Photo 146B - Oak Street



**Photographs of Rehabilitation Conducted by
Brockton Sewer Department**

Before

Photo 147A - Oak Street



After

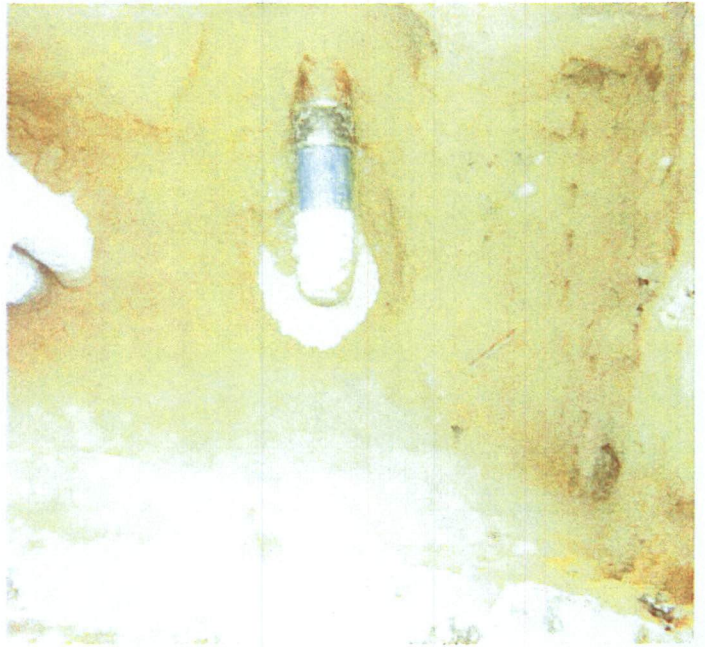
Photo 147B - Oak Street



Photo 148A - Oak Street



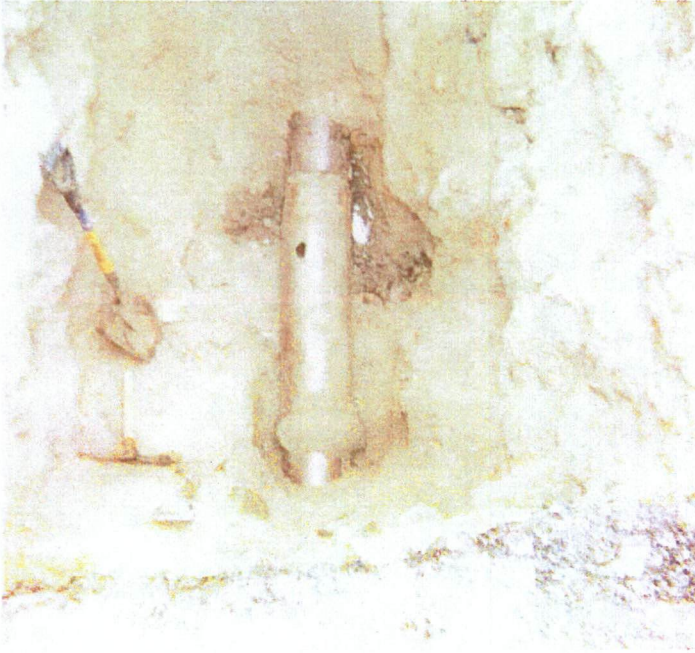
Photo 148B - Oak Street



**Photographs of Rehabilitation Conducted by
Brockton Sewer Department**

Before

Photo 149A - Rutland Street



After

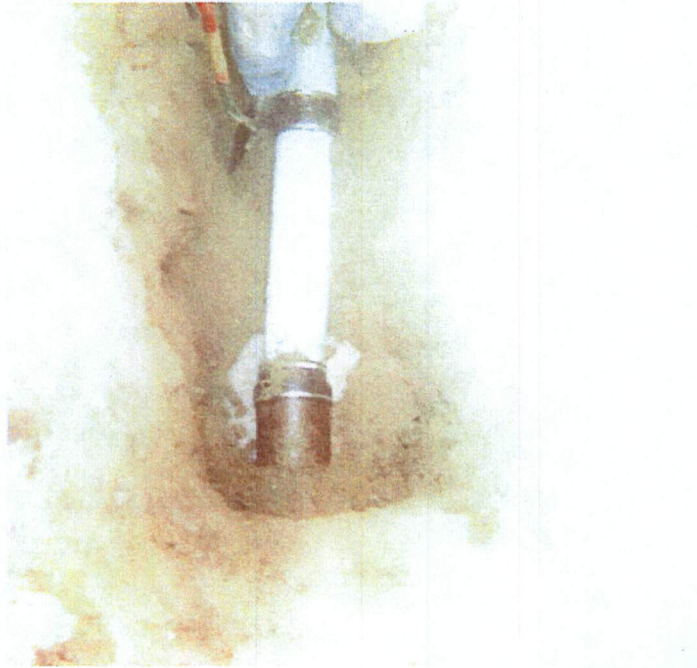
Photo 149B - Rutland Street



Photo 150A - Rutland Street



Photo 150B - Rutland Street



Photographs of Rehabilitation Conducted by Brockton Sewer Department

Before

After

Photo 151A - Rutland Street



Photo 152A - Rutland Street



Photo 152B - Rutland Street



**Photographs of Rehabilitation Conducted by
Brockton Sewer Department**

Before

Photo 153A - Rutland Street



After

Photo 153B - Rutland Street



Photo 154A - Upland Street



Photo 154B - Upland Street



**Photographs of Rehabilitation Conducted by
Brockton Sewer Department**

Before

After

Photo 155A - Keith Avenue





56 Exchange Terrace, Fourth Floor
Providence, Rhode Island 02903
tel: 401 751-5360
fax: 401 751-5499

September 29, 2006

Ms. Barbara Kelley Business Area Manager
Walsh Construction Company
2 Commercial Street
Sharon, Massachusetts 02067

Subject: Brockton, Massachusetts
WWTF Upgrade - Phase 3
DPW Project No. 06-1114, CWSRF No. 1722
Notice to Proceed

Dear Ms. Kelley:

This is to confirm that the City completed its execution of the construction contracts today and your copy is available for pick-up at City Hall. This information was verbally conveyed to Ms. Elizabeth Brosnan of your Phase 2 field office today who agreed to wait for a signed copy that will be delivered to the WWTF field office on Monday, October 2, 2006. Receipt of this notice (one copy will also be transmitted by facsimile today) constitutes your notice to proceed with the work on the project.

The Contract Time as defined in Article 3 of the Agreement is 750 calendar-days commencing 20 days following the effective contract signing date of September 29, 2006. Therefore, the contract period will begin on October 19, 2006 and will expire on November 6, 2008.

Please furnish a breakdown of the lump sum bid items and preliminary construction schedule in advance of the preconstruction meeting that will be scheduled shortly.

Please call me if you have any questions.

Very truly yours,

Antonio V. Bonilla
Construction Coordinator
Camp Dresser & McKee Inc.

C: Mr. Michael L. Thoreson, Commissioner of Public Works
Mr. David A. Norton, Water & Sewer Contract Administrator
Mr. Larry Rowley, Superintendent of Utilities
Mr. Michael C. Morris, Chief Procurement Officer
Ms. Elaine Czaja, Administrative Assistant
Mr. Jack Hamm, MA DEP

NTP